

## **SENTENCE DATA SHEET**

**DEFENDANT:** ANTHONY MACE

**CRIMINAL NO:** 17-CR-618-1

**GUILTY PLEA:** Count One of Information  
Conspiracy to violate the Foreign Corrupt Practices Act  
[Title 15, United States Code, Section 78dd-2],  
in violation of Title 18, United States Code, Section 371.

**CITIZENSHIP:** United Kingdom

### **SUBSTANCE OF**

**PLEA AGREEMENT:** (a) Defendant is pleading to Count One of the Information.  
(b) United States agrees not to oppose Defendant's  
anticipated request to the Court and the United States  
Probation Office that he receive a two level downward  
adjustment pursuant to section 3E1.1 and not to oppose  
Defendant's request for an additional one-level departure  
based on the timeliness of the plea.

**COUNT ONE:** Conspiracy to violate the Foreign Corrupt Practices Act  
[Title 15, United States Code, Section 78dd-2 ("FCPA")],  
in violation of Title 18, United States Code, Section 371.

### **ELEMENTS:**

#### **Conspiracy - Title 18, United States Code, Section 371.**

*First:* That the defendant and at least one other person made an  
agreement to violate the FCPA as charged in the information;

*Second:* That the defendant knew the unlawful purpose of the  
agreement and joined in it willfully, that is, with the intent to further the unlawful  
purpose; and

*Third:* That one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the information, in order to accomplish some object or purpose of the conspiracy.

**Foreign Corrupt Practices Act – 15 U.S.C. §§ 78dd-2**

*First:* That the defendant is a “domestic concern,” or an officer, director, employee, or agent of a “domestic concern,” or a stockholder thereof acting on behalf of such a domestic concern, or aided and abetted a domestic concern<sup>1</sup>;

*Second:* That the defendant acted corruptly and willfully;

*Third:* That the defendant made use of the mails or any means or instrumentality of “interstate commerce” in furtherance of an unlawful act under this statute—namely, an offer, payment, promise to pay, or authorization of the payment of money or anything of value—or aided and abetted another to do the same;

*Fourth:* That the defendant offered, paid, promised to pay, or authorized the payment of money or gift or anything of value;

*Fifth:* That the offer, promise to pay, or authorization of the payment of money or anything of value was either (a) to a foreign official, or (b) to any person while the defendant knew that all or a portion of the payment would be offered, given, or promised, directly or indirectly, to a foreign official;

*Sixth:* That the payment was intended for one of three purposes relevant to this action: (a) to influence any act or decision of a foreign public official in his official capacity; (b) to induce such a foreign

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<sup>1</sup> A “domestic concern” is defined to include any individual who is a citizen, national, or resident of the United States; and any corporation, partnership, association, joint-stock company, business trust, unincorporated organization, or sole proprietorship which has its principal place of business in the United States, or which is organized under the laws of a State of the United States or a territory, possession, or commonwealth of the United States.

official to do or omit to do any act in violation of the lawful duty of such foreign official; or (c) to secure any improper advantage; and

*Seventh:* That the payment was to assist the domestic concern in obtaining or retaining business for, or with, or directing business to, any person.

**PENALTY:** Up to 5 years imprisonment;  
Fine of not more than \$250,000 or twice the gross gain or loss;  
Up to 3 years supervised release; and  
\$100 special assessment.